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And Mauricio Garcia Guerrero

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

Josh Arredondo, individually, and Martina Gomez  
De Arredondo, individually;

Plaintiffs,

vs.

Mauricio Garcia Guerrero, individually; Swift  
Transportation Co. of Arizona, LLC dba Swift  
Leasing Co., LLC a foreign corporation; Doe  
Individuals 1-20, inclusive; and Roe Corporations 1-  
20, inclusive,

Defendants.

Case No.: 2:24-cv-1211

**Stipulation and Order to Extend  
Discovery [First Request]**

**I. Summary of Discovery Completed**

The case was removed on July 8, 2024<sup>1</sup>. Both parties have served their disclosures, Plaintiff on September 27, 2024, and Defendants on July 11, 2024. The Order Granting the Stipulated Discovery Plan and Scheduling Order was filed on July 15, 2024<sup>2</sup>. Defendant served written discovery on Plaintiff July 11, 2024, and Plaintiff's responses were served September 27, 2024. Plaintiff served discovery on Defendants July 11, 2024, and Defendants response were served September 27, 2024. Plaintiff Josh Arredondo had a Rule 35 medical examination completed on August 1, 2024.

<sup>1</sup> ECF 1.

<sup>2</sup> ECF 9.

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3 **II. Discovery Remaining**

4 Now in receipt of HIPAA authorizations, Defendants will use Plaintiffs' medical records to  
5 independently pursue medical records from both Plaintiffs' providers. Plaintiff Josh Arredondo is  
6 also considering a major surgical procedure, pending medical clearance testing scheduled on  
7 October 30, 2024. The parties have also agreed to a half day mediation scheduled for October 9,  
8 2024. Defendants need to depose Plaintiffs, and Plaintiffs need to depose Defendants.

9 Obtaining Plaintiffs' medical records is necessary before Defendants can then evaluate when  
10 to depose Plaintiffs. Whether or not Plaintiff Josh proceeds with surgery also affects which damages  
11 experts might be necessary for this case. Presumably after expert disclosures there might also be  
12 expert depositions.

13 **III. Why the Remaining Discovery Could not be Completed**

14 The current discovery deadlines could not be met because the parties both needed additional  
15 time to respond to written discovery, and Defendants did not receive HIPAA authorizations for  
16 Plaintiffs until September 27, 2024.

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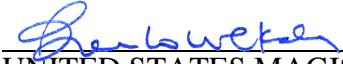
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**IV. Proposed Schedule for Completing All Remaining Discovery**

	<b>Current Deadline</b>	<b>Proposed Deadline</b>
Amending Pleadings and Adding Parties	October 1, 2024	No Change
Initial Expert Disclosures & Interim Status Report	October 31, 2024	December 30, 2024
Rebuttal Expert Disclosures	December 2, 2024	January 31, 2025
Discovery Closes	December 30, 2024	February 28, 2025
Dispositive Motions	January 29, 2025	March 28, 2025
Pre-Trial Order, if no Dispositive Motions	February 28, 2025	April 29, 2025

Dated: October 1, 2024

Dated: October 1, 2024

 <u>/s/ Kimberly A. Nelson</u> Michael P. Lowry, Esq. Nevada Bar No. 10666 Kimberly A. Nelson, Esq. Nevada Bar No. 15295 Attorneys for Swift Transportation Co. of Arizona, LLC, and Mauricio Garcia Guerrero	 DIMOPOULOS INJURY LAW  <u>/s/ Paul A. Shpirt</u> Steve Dimopoulos, Esq. Nevada Bar No. 12729 Paul A. Shpirt, Esq. Nevada Bar No. 10441 Attorneys for Josh Arredondo and Martina Gomez De Arredondo
 Dated: October 2, 2024	It is so ordered.   UNITED STATES MAGISTRATE JUDGE